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Lead Counsel for the Indirect Purchaser
Plaintiffs for the 22 States

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 4:07-cv-05944-JST

MDL No. 1917

This Document Relates to:

ALL INDIRECT PURCHASER
ACTIONS

**DECLARATION OF MARIO N. ALIOTO
IN SUPPORT OF INDIRECT PURCHASER
PLAINTIFFS' RESPONSE TO MOTIONS
TO INTERVENE AND AMEND
COMPLAINT**

Hearing Date: October 23, 2019

Time: 2:00 p.m.

Courtroom: 6, 2nd Floor (Oakland)

Judge: Honorable Jon S. Tigar

1 I, Mario N. Alioto, declare:

2 1. I am an attorney duly licensed by the State of California and am admitted to
3 practice before this Court. I am a partner with the law firm Trump, Alioto, Trump & Prescott,
4 LLP and my firm serves as the Court-appointed Lead Counsel for the Indirect Purchaser
5 Plaintiffs (“IPPs”) for the 22 States in the above-captioned action. I submit this Declaration in
6 support of the IPPs’ Response to Motions to Intervene and Amend Complaint, filed herewith.
7 The matters set forth herein are within my personal knowledge and if called upon and sworn as a
8 witness I could competently testify regarding them.

9 2. Counsel for the ORS/NRS Plaintiffs never contacted me prior to filing any of their
10 proposed amended complaints to discuss their proposed amendments to IPPs’ complaint. Nor did
11 they ever send me a copy of the proposed amended complaints prior to filing, or otherwise
12 consult with me or get my consent to their proposed amendments to IPPs’ operative complaint.

13 3. Counsel for the ORS/NRS Plaintiffs never obtained the consent of the named IPPs
14 to propose amendments to IPPs’ complaint.

15 4. I do not concur in the ORS/NRS Plaintiffs’ proposed amendments of the IPPs’
16 complaint.

17 5. I believe that the ORS/NRS Plaintiffs purport to voluntarily dismiss Panasonic
18 North America because the Court granted summary judgment in favor of Panasonic North
19 America in certain Direct Action Plaintiff cases. *See* ECF No. 5119.

20 6. IPPs settled with the Panasonic defendants, including Panasonic NA, shortly after
21 the filing of their summary judgment motion, and the motion was withdrawn pending final
22 approval of their settlement.

23 I declare under penalty of perjury that the foregoing is true and correct. Executed this
24 20th day of September 2019 at San Francisco, California.

25
26 /s/ Mario N. Alioto

27 Mario N. Alioto

28 ***Lead Counsel for the Indirect Purchaser Plaintiffs
for the 22 States***